

REMARKS

In response to the Examiner's objections as to the form of Claim 55, Applicants have extensively revised Claim 55 by means of the foregoing Amendment, and it is believed that the invention is now clearly expressed and is in compliance with the terms of 35 U.S.C. §112.

In the Office Action independent Claim 55 was rejected as being anticipated by the cited Crowell patent. In this regard, however, it is believed that Claim 55 as now clearly presented, is patentably distinct over the Crowell reference.

In particular, in accordance with independent Claim 55, a photoelectric conversion device and a control circuit are provided in a housing, wherein the device has a plurality of substrates each having a plurality of photoelectric conversion elements, and a wavelength converting member arranged on the conversion elements. Significantly, a grounded conductor is required to be disposed between the housing and the wavelength converting member, and this requirement is not disclosed in the cited Crowell patent, nor in any of the other references.

Specifically, with reference to the Crowell patent there is disclosed in Figs. 4 and 5, and at column 6, lines 35-45, that a conductive member 38 can be grounded. However, member 38, which is relied upon in the Office Action as disclosing the conductive member of Applicant's Claim 55, is not "disposed between said housing and said wavelength converting member" as required in Claim 55. Instead, member 38 of Crowell is itself part of the housing (namely, the lid therefor). Accordingly, member 38 in Crowell cannot be deemed to suggest the conductive member of Applicant's Claim 55.

For all these various reasons Applicants respectfully submit that all of the claims in the application are allowable, and the issuance of a formal notice of Allowance is solicited

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address given below.

Respectfully submitted,



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